

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE	)	
	)	
ALEXANDER E. JONES	)	CASE No. 22-33553
	)	
DEBTOR.	)	(CHAPTER 11)
	)	
	)	JUDGE CHRISTOPHER M. LOPEZ

**FIRST MONTHLY FEE STATEMENT OF THE REYNAL LAW FIRM, P.C.  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED  
AS SPECIAL COUNSEL TO THE DEBTOR FOR THE PERIOD FROM  
JANUARY 8, 2023 THROUGH NOVEMBER 30, 2023**

Name of Applicant:	The Reynal Law Firm, P.C.	
Applicant's Role in Case:	Special Counsel to Debtor	
Date Order of Appointment Signed:	February 28, 2023 (Dkt #187)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	01/08/2023	11/30/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:		\$105,824.00 <sup>1</sup> (80% of \$132,280.00)
Total Reimbursable Expenses Requested in this Statement:		\$342.75
Summary of Fees for the Period Covered by this Statement		
Professional Fees in this Statement:		\$132,280.00
Total Actual Professional Hours Covered by this Statement:		248.45
Average Hourly Rate for Professionals:		\$532.43

**In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

<sup>1</sup> The Reynal Firm is holding \$50,000.00 as a retainer in its Trust Account.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], The Reynal Law Firm, P.C. (“The Reynal Firm”), as special counsel to the Debtor, hereby files its *First Monthly Fee Statement of The Reynal Law Firm, P.C. for Allowance of Compensation for Services Rendered as Special Counsel to the Debtor for the Period from January 8, 2023 through November 30, 2023* (the “Monthly Fee Statement”).

### **RELIEF REQUESTED**

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, The Reynal Firm seeks interim payment of \$105,824.00 (80% of \$132,280.00) as compensation for professional services rendered to the Debtor during the period from January 8, 2023 through November 30, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$342.75, for a total amount of \$106,166.75 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.<sup>2</sup>

2. In support of the Monthly Fee Statement, The Reynal Firm submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Fees by Category as Special Counsel for the Fee Period*, attached as **Exhibit B**, and a *Detailed Record of Fees as Special Counsel for the Fee Period*, attached hereto as **Exhibit C**.

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<sup>2</sup> The Reynal Firm has been retained to jointly represent both Debtor and Free Speech Systems, LLC, the debtor in a related chapter 11 (subchapter v) proceeding *In re Free Speech Systems, LLC*, Case No. 22-60043, United States Bankruptcy Court for the Southern District of Texas, Houston Division. As such, all hours, costs and expenses, and fees claimed herein are half of the total amounts invoiced.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, [sjordan@jhwclaw.com](mailto:sjordan@jhwclaw.com))
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, The Reynal Firm submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. The Reynal Firm reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, The Reynal Firm respectfully submits support for its fees in the amount of \$132,280.00 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$342.75 for reasonable, actual and necessary expenses incurred during the Fee Period. The Reynal Firm further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to The Reynal Firm the amount of \$106,166.75<sup>3</sup> which is equal to the sum of 80% of The Reynal Firm's fees and 100% of The Reynal Firm's expenses incurred during the Fee Period.

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<sup>3</sup> Such payment to be made first from any existing retainer funds held by The Reynal Firm for the Debtor.

Houston, TX

Dated: December 20, 2023

**THE REYNAL LAW FIRM, P.C.**

By: /s/ F. Andino Reynal

F. Andino Reynal

917 Franklin St. S

Houston, TX 77002

Telephone: 713-228-5900

Email: areynal@frlaw.us

**SPECIAL COUNSEL FOR DEBTOR,  
ALEXANDER E. JONES**

### CERTIFICATE OF SERVICE

I certify that on December 20, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, [sjordan@jhwclaw.com](mailto:sjordan@jhwclaw.com))
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com)
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

**EXHIBIT “A”**

**SUMMARY OF EXPENSES FOR THE FEE PERIOD**

<b>EXPENSE</b>	<b>TOTAL</b>
Ground Transportation	<b>0.00</b>
Lodging/Travel	<b>324.75</b>

**EXHIBIT “B”****SUMMARY OF FEES AND EXPENSES BY CATEGORY  
FOR THE FEE PERIOD**

<b><u>CATEGORIES</u></b>	<b><u>ATTORNEY TIME</u></b>	<b><u>PARALEGAL TIME</u></b>
B110 Case Administration	0.00	0.00
B120 Asset Analysis and Recovery	0.00	0.00
B130 Asset Disposition	0.00	0.00
B140 Relief from Stay/Adequate Protection	0.00	0.00
B150 Meetings of & Communications with Creditors	0.00	0.00
B160 Fee/Employment Applications	0.00	0.00
B170 Fee/Employment Objections	0.00	0.00
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	0.00	0.00
B190 Other Contested Matters	248.45	0.00
B195 Non-Working Travel	0.00	0.00
B210 Business Operations	0.00	0.00
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	0.00	0.00
B240 Tax Issues	0.00	0.00
B250 Real Estate	0.00	0.00
B260 Board of Directors Matters	0.00	0.00
B310 Claims Administration and Objections	0.00	0.00
B320 Plan and Disclosure Statement	0.00	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
<b>TOTALS:</b>	<b>248.45</b>	<b>0.00</b>



**EXHIBIT “C”**

**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

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## THE REYNAL LAW FIRM, P.C.

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April 13, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218  
Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones from February 1 through April 6, 2023.

<b>Time Keeper F. Andino Reynal</b>			
<b>Date</b>	<b>Description</b>	<b>Time</b>	<b>Total</b>
23.02.1	Teleconference with client	1	800
	Teleconference with V. Driver	0.5	400
23.02.09	Teleconference with Client regarding Heslin	0.5	400
23.02.11	Attention to E. Taube Response	1	800
23.02.12	Teleconference regarding attorney client privilege waiver	0.5	400
23.02.13	Review Fourth draft of motion for new trial	1	800
23.02.14	Review draft statement re: demand for retraction	1.5	1,200
23.02.15	Attention to client	0.5	400
23.02.20	Teleconference with Chris Martin Re: Fontaine Hearing	0.5	400
23.02.21	Prepare response re: trial expense Pozner	1	800
	Review supplemental exhibits E. Taube Hearing	1.5	1,200
23.02.27	Review Motion for Sanctions	3.1	2,480
23.03.28	Revised Response to Motion for Sanctions for Motion for New Trial	2.3	2,240
23.03.30	Telecon with Randall Yates at Crowe Dunlevy.	0.5	400

23.04.03	Review Reply to motion for sanctions; prepare for hearing.	3.3	2,640
23.04.04	Drive to Austin; prep for hearing	6.2	4,960
23.04.05	Prep for and attend hearing	8	6,400
23.04.06	Prep for and attend hearing	4	3,200
	Drive to Houston	3	2,400
	<b>TOTAL PROF. FEES</b>		<b>\$32,320</b>
EXPENSES	2 nights Hotel Austin		\$1,371
	<b>TOTAL EXPENSES</b>		<b>\$1,371</b>

**Grand Total: 33,691.00**  
**Payable on receipt**

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## THE REYNAL LAW FIRM, P.C.

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May 22, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218  
Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones from February 1 through April 6, 2023.

<b>Time Keeper</b>	<b>F. Andino Reynal (\$800/hour)</b>		
<b>Date</b>	<b>Description</b>	<b>Time</b>	<b>Total</b>
23.02.1	Teleconference with client	1	800
	Teleconference with V. Driver	0.5	400
23.02.09	Teleconference with Client regarding Heslin	0.5	400
23.02.11	Attention to E. Taube Response	1	800
23.02.12	Teleconference regarding attorney client privilege waiver	0.5	400
23.02.13	Review Fourth draft of motion for new trial	1	800
23.02.14	Review draft statement re: demand for retraction	1.5	1,200
23.02.15	Attention to client	0.5	400
23.02.20	Teleconference with Chris Martin Re: Fontaine Hearing	0.5	400
23.02.21	Prepare response re: trial expense Pozner	1	800
	Review supplemental exhibits E. Taube Hearing	1.5	1,200
23.02.27	Review Motion for Sanctions	3.1	2,480
23.03.28	Revised Response to Motion for Sanctions for Motion for New Trial	2.3	2,240
23.03.30	Telecon with Randall Yates at Crowe Dunlevy.	0.5	400

23.04.03	Review Reply to motion for sanctions; prepare for hearing.	3.3	2,640
23.04.04	Drive to Austin	3	1200
23.04.04	Hearing Prep	3.2	2560
23.04.05	Prep for and attend hearing	8	6,400
23.04.06	Prep for and attend hearing	4	3,200
	Drive to Houston	3	1200
23.04.18	Reviewed Correspondence	0.4	320
23.04.19	Teleconference with client	0.5	400
23.05.01	Spot checking production and sharing with BK counsel	3.2	2,560
	Teleconference Vickie Driver	0.4	320
	Teleconference C. Martin	0.2	160
23.05.09	Teleconference with Norm Pattis Re: Appellate Issues	0.4	320
			<b>\$34,000</b>
<b>Time Keeper</b>	<b>West Medlin (400/hour)</b>		
23.02.01	Research case history; filing history; and correspondence history to identify all lawyers that represented Mr. Jones or related entities.	1.3	520
23.03.07	Assemble and prepare materials in furtherance of appeal.	2.3	920
23.03.13	Review and assemble documents and materials in coordination with appellate attorneys.	3.4	1,360
23.03.14	Review and assemble documents and materials in coordination with appellate attorneys.	1.2	480
23.03.28	Review and analyze draft of response to plaintiff's motion for sanctions and motion to strike	1.0	400
23.03.29	Research regarding local filing rules in the subject court; correspondence to appellate attorneys regarding same.	0.4	160

23.04.24	Review; analyze; and assemble production from all outstanding cases	5.1	2,040
23.04.25	Review; analyze; and assemble production from all outstanding cases	3.3	1,320
			<b>\$7,200</b>
	<b>TOTAL PROF. FEES</b>		<b>\$41,200</b>
EXPENSES	2 nights Hotel Austin		\$685.50
	<b>TOTAL EXPENSES</b>		<b>\$685.5</b>

**Grand Total: 41,885.50**  
**Payable on receipt**

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## THE REYNAL LAW FIRM, P.C.

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August 3, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218  
Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones in June and July, 2023.

<b>Time Keeper</b>	<b>F. Andino Reynal (\$800/hour)</b>		
<b>Date</b>	<b>Description</b>	<b>Time</b>	<b>Total</b>
06/03/23	5th Cir Status Report	0.2	160
06/18/23	Correspond with Vickie Driver re: Pozner/ Delarosa trial	0.8	640
06/24/23	Review Connecticut brief	0.9	720
	Review transcript of May 19 Status Conference	0.3	240
	Outlining Research Items	0.5	400
06/30/23	Compile potential points of error and circulate among counsel	1.3	1040
	Review correspondence	0.1	80
	Review Record on appeal	1.3	1040
07/3/23	Review Record on appeal	1.5	1200
07/5/23	Teleconference with Bankruptcy Team	1	800
	5th Cir Status Report	0.2	160
07/06/23	Appeal team zoom	0.5	400
07/07/23	Meet with Jury Consultant Re: Pozner case	0.6	480
07/09/23	Legal Research: Law Journal and Austin COA opinions	1.1	880
07/26/23	Transcript Review; issue tagging	1	800

07/28/23	Transcript Review; issue tagging; outlining brief	2.3	1840
07/29/23	Outline brief; legal research	1.7	1360
07/30/23	Transcript review; legal research	2.8	2240
			<b>\$14,480</b>
<b>Time Keeper</b>	<b>West Medlin (400/hour)</b>		
07/17/23	Attention to project regarding review of case transcripts and volumes; discussion with lead attorney regarding same.	0.2	\$80.00
07/23/23	Review and analyze multiple volumes of trial transcript. Create spreadsheet capturing lines relevant to certain appellate issues and arguments.	12.1	\$4,840.00
07/26/23	Review and analyze multiple volumes of trial transcript. Create spreadsheet capturing lines relevant to certain appellate issues and arguments.	3.1	\$1,240.00
	Phone conference with lead attorney regarding trial record and strategy.	0.3	\$120.00
07/27/23	Review and analyze multiple volumes of trial transcript. Create spreadsheet capturing lines relevant to certain appellate issues and arguments.	4.6	\$1,840.00
07/31/23	Review and analyze multiple volumes of trial transcript. Create spreadsheet capturing lines relevant to certain appellate issues and arguments.	8.3	\$3,320.00
			<b>\$11,440</b>
	<b>TOTAL PROF. FEES</b>		<b>\$25,920.00</b>
EXPENSES			
	<b>TOTAL EXPENSES</b>		<b>0</b>



**Grand Total: \$25,920**  
**Payable on receipt**

# THE REYNAL LAW FIRM, P.C.

September 8<sup>th</sup>, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218  
Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones in August and September 2023.

Time Keeper	F. Andino Reynal (\$800/hour)		
Date	Description	Time	Total
08/03/23	File Corsi Status Report.	0.2	160
	Transcript Review; issue tagging; outlining brief.	1.5	1,200
08/11/23	Prepare and participate appeal team zoom.	1.8	1,440
	Legal Research improper anchoring; IIED scope vis-à-vis defamation.	2.5	2,000
08/18/23	Prepare and participate appeal team zoom.	1.6	1,280
	Legal Research: Damages Act/Bifurcation; review record citations.	4.3	3,440
08/23/23	Revise argument section regarding bifurcation issue.	2.6	2,080
08/25/23	Prepare and participate in appeal team zoom.	1.4	1,120
08/27/23	Review COA opinion re IIED; research permissible scope of sanction order; issue estoppel.	2.8	2,240
08/30/23	Attention to Pozner file; review of documents and pleadings and discovery.	5.2	4,160
08/31/23	Legal Research regarding amended cap buster claims; penal code provisions regarding injury to a disabled person.	5.7	4,560
9/08/23	Review and revise IIED argument section.	1.4	1,120
			<b>\$24,800</b>
Time Keeper	West Medlin (400/hour)		
Date	Description	Time	Total

08/07/23	Revise and edit appellate outline regarding improper evidence permitted in phase one; incorporate record citations and citations to Texas authority regarding improper jury charge as to punitive damages.	3.5	1,400
08/10/23	Additional legal research and transcript review regarding issues in preparation for meeting with appellate attorneys.	6.2	2,480
08/11/23	Strategy meeting with lead counsel and appellate counsel; forward caselaw to appellate counsel.	0.9	360
08/18/23	Prepare for and attend strategy meeting with appellate attorneys regarding next steps.	1.6	640
08/19/23	Legal research of Texas Civil Practice and Remedies Code Section 41 regarding bifurcation and evidence permitted between phase one and phase two of trial; research and analyze Texas caselaw regarding application of TCPRC 41 bifurcation in cases where a default judgment has been rendered.	4.2	1,680
08/20/23	Review and analyze trial transcripts and evidence for citations to plaintiffs using improper evidence regarding exemplary damages in phase one of trial.	4.0	1,600
08/21/23	Continue review of trial transcripts and evidence for citations to plaintiffs using improper evidence regarding exemplary damages in phase one of trial.	5.1	2,040
08/22/23	Begin drafting section of appellate brief regarding trial court's failure to properly bifurcate pursuant to CPRC 41 and error in permitting exemplary evidence in phase one of trial.	6.1	2,440
08/23/23	Legal research regarding appellate review for trial court's violation of statute.	1.7	680
08/24/23	Revise and edit draft section of appellate brief regarding bifurcation.	2.7	1,080
	Meeting with appellate lawyer regarding strategy and document citations from record.	1.1	440
	Review files and case records for video deposition clips played at trial.	1.5	600
08/25/23	Prepare for and attend strategy meeting with lead attorney and appellate team regarding status and next steps.	1.0	400

	Research and analyze motion to dismiss previously filed in Lewis's case regarding discussion of plaintiff's IIED claim; additional legal research regarding IIED claims and their dismissal for being duplicative.	1.3	520
08/26/23	Review and analyze caselaw regarding IIED brought in conjunction with defamation claims and determine circumstances when IIED survives a motion to dismiss.	2.0	800
	Review and analyze procedural history in Lewis's matter regarding handling of IIED claim; review and analyze court of appeal opinion regarding same.	0.8	320
08/27/23	Review and analyze procedural history in both Heslin matters and determine timeline of joining Heslin's IIED suit with Heslin's defamation suit; review and analyze court of appeal opinions regarding Heslin's IIED claim.	1.6	640
08/28/23	Research and analyze Texas legal authority discussing the scope of defamation damages and injuries regarding harassment or ridicule by third parties; review and analyze plaintiff's various petitions regarding allegations of wrongdoing beyond publication of false statements.	2.3	920
	Begin drafting outline of appellate section regarding IIED dismissal; review and analyze trial transcript regarding evidence of wrongdoing independent of the publication of false statements.	4.1	1,640
08/29/23	Review and analyze trial transcript regarding evidence in support of IIED claim.	2.5	1,000
	Draft and revise IIED section of appellate brief incorporating evidence elicited during the testimony of Mr. Heslin; additional legal research regarding IIED claims regarding deceased persons.	8.5	3,400
08/30/23	Revise, draft, and edit IIED section of appellate brief; additional legal research regarding IIED liability for the acts of unrelated third parties.	5.5	2,200
	Draft and edit IIED section of appellate brief.	4.3	1,720
08/31/23	Review and analyze testimony of Dr. Crouch and Scarlett Lewis; incorporate evidence into brief; legal research and analysis regarding liability for harassment of non-parties.	5.1	2,040
09/01/23	Review and analyze legal articles discussing scope of defamation liability.	3.0	1,200
			<b>\$32,240</b>

<b>Time Keeper</b>	<b>Joe Magliolo (\$800/hour)</b>		
<b>Date</b>	<b>Description</b>	<b>Time</b>	<b>Total</b>
8/30/2023	Review pleadings; written discovery	4.3	3440
8/31/2023	Review recent opinions regarding emotional distress; reputational damages; draft proposed scaled voir dire questions	5.1	4080
9/1/2023	Review trial testimony and argument in Heslin v. Jones; review Pozner and De La Rosa Depositions	4.7	3760
9/2/2023	Review recent expert witness cases; review testimony Roy Lubbitt; draft proposed cross-examination questions	5.6	4480
9/3/2023	Review hearing transcripts; Review Jones videos	4.0	3200
			<b>\$18,960</b>
<b>TOTAL PROF. FEES</b>			<b>\$75,920</b>
EXPENSES			
	<b>TOTAL EXPENSES</b>		<b>\$0</b>

**Grand Total: \$75,920**  
**Payable on receipt**

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## THE REYNAL LAW FIRM, P.C.

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October 11<sup>th</sup>, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218  
Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones in September and October 2023.

Time Keeper	F. Andino Reynal (\$800/hour)		
Date	Description	Time	Total
09/13/23	Reviewed joint and several liability research and argument section for inclusion in appellate brief.	1.7	1,360
09/27/23	Reviewed argument section related to improper amendment and entry of the judgement for inclusion in appellate brief.	2.4	1,920
09/29/23	Reviewed million-dollar sanction research and briefing for including in appellate brief.	0.8	640
	Prepared for and participated in appellate team meeting.	1	800
10/04/23	Corsi Status Report	0.2	160
10/05/23	Prepared for and participated in appellate team meeting.	1.5	1,200
	Reviewed case law supporting 1st amendment claim.	1.1	880
			<b>6,960</b>
Time Keeper	West Medlin (400/hour)		
Date	Description	Time	Total
09/06/23	Review and analyze hearing and trial transcripts regarding jury charge and discussion of joint and several liability as to exemplary damages.	4.6	1,840
09/07/23	Research legal authority regarding possible waiver of objection to joint and several liability in jury charge as to exemplary damages.	3.2	1,280

	Research legal authority regarding possible exceptions to CPRC 41.006 as to exemplary damages.	3.7	1,480
09/08/23	Review and analyze additional legal authority supporting position that jury charges permitting joint and several liability as to exemplary damages, regardless of objections on the record, is reversible error.	4.9	1,960
09/11/23	Begin outlining and drafting portion of appellate brief regarding plaintiffs' failure to secure jury findings of exemplary damages specific to each defendant.	6.2	2,480
09/12/23	Revise and edit portion of appellate brief regarding violations of CPRC 41.006 and joint and several liability as to exemplary damages.	3.5	1,400
09/13/23	Final review and edits to section of appellate brief regarding violations of CPRC 41.006 and joint and several liability as to exemplary damages; forward same to lead attorney for review and comment.	2.9	1,160
09/14/23	Review and analyze Texas rules and authority regarding a party's right to amend pleadings; review and analyze Texas rules and authority regarding limits to exemplary damages.	4.6	1,840
09/15/23	Review and analyze trial transcripts and hearing transcripts regarding plaintiffs' post-trial amendment to petition; review and analyze prior filings in case regarding same.	3.3	1,320
09/18/23	Research and analyze Texas exceptions to exemplary damages cap in civil practice and remedies code; research and analyze caselaw discussing burden of proof as to exemplary damage cap exceptions listed in CPRC 41.008; research and analyze effect of default judgment on a party's ability to amend a petition to include exceptions to statutory cap on exemplary damages; begin outlining and drafting section of appellate brief discussing plaintiffs' post-trial amendment of petition.	7.1	2,840
09/19/23	Continue outlining and drafting section of appellate brief discussing plaintiffs' improper post-trial amendment of petition.	8.4	3,360

09/20/23	Final revisions and edits to section of appellate brief discussing plaintiffs' improper post-trial amendment of petition; forward same to lead counsel for review and comment.	3.6	1,440
09/21/23	Review and edit appellate section regarding improper preservation of IIED claim.	3.1	1,240
09/22/23	Review and analyze prior filings in case regarding sanctions of attorneys' fees awarded to Plaintiffs.	3.6	1,440
09/25/23	Begin outlining section of appellate brief regarding improper levying of attorneys' fees sanctions.	2.2	880
09/27/23	Begin drafting section of appellate brief regarding improper levying of attorneys' fees sanctions	3.1	1,240
09/28/23	Continue drafting section of appellate brief regarding improper levying of attorneys' fees sanctions.	7.3	2,920
09/29/23	Research and analyze Texas case law and authority regarding Rule 215 and limitations on award of attorneys' fees as sanction.	2.2	880
	Strategy meeting regarding status of various projects related to appeal.	0.4	160
	Final review of caselaw and edits to brief regarding improper sanction of attorneys' fees.	1.5	600
			<b>31,760</b>
<b>TOTAL PROF. FEES</b>			<b>\$38,720</b>
EXPENSES			
	<b>TOTAL EXPENSES</b>		<b>\$ 0</b>

**Grand Total: \$38,720.00**  
**Payable on receipt**



# THE REYNAL LAW FIRM, P.C.

November 6<sup>th</sup>, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218  
Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones in October 2023.

Time Keeper	F. Andino Reynal (\$800/hour)		
Date	Description	Time	Total
10/16/23	Teleconference with Chris Martin	0.3	240
10/17/23	Prepared anticipated budget.	1.2	960
10/25/23	Reviewed Opinion on Dischargeability.	0.7	560
10/31/23	Reviewed and edited draft brief on appeal.	4.3	3,440
	Teleconference with Chris Martin and Vickie Driver.	0.5	400
			<b>5,600</b>
Time Keeper	West Medlin (400/hour)		
Date	Description	Time	Total
10/02/23	Receipt and review of comments and edits to section of appeal regarding IIED being duplicative claim of defamation; incorporate same into brief; review and analyze trial record and procedural history to incorporate additional cites into brief.	5.2	2,080
10/03/23	Receipt and review of comments and edits to section of appeal regarding post-trial petition amendment; incorporate same into brief; further revisions to section regarding effect of amendment on verdict.	5.9	2,360
10/04/23	Receipt and review of comments and edits to section of appeal regarding improper bifurcation; incorporate same into brief; additional review of trial record regarding instances of bifurcation failure; incorporate same into brief.	6.1	2,440

10/05/23	Receipt and review of comments and edits to section of appeal regarding joint and several liability of exemplary damages; incorporate same into brief; further revisions to section regarding jury verdict and final judgment.	1.6	640
	Legal research and analysis of caselaw discussing suppression of speech by social media companies unduly influenced by government.	2.0	800
10/06/23	Legal research regarding a party's ability to present duplicative evidence of a legal position no longer in dispute, in support of section of appellate brief regarding improper bifurcation.	2.2	880
10/10/23	Review and analyze caselaw regarding scope of first amendment protections in furtherance of section of appeal regarding same; review case record for citations in support of section of appeal regarding IIED.	4.7	1,880
10/11/23	Receipt and review of statement of case and statement of facts sections of appeal; strategize edits and improvements to same; review of record for additional citations.	1.9	760
10/12/23	Meeting with co-counsel regarding appellate brief; review edit, and draft portion of introduction, statement of facts, and multiple substantive sections.	7.2	2,880
10/13/20	Draft and edit statement of case and statement of facts sections of appeal.	4.1	1,640
10/18/23	Edit and revise introduction to appellate brief.	3.1	1,240
	Strategy meeting with co-counsel regarding appeal.	2.3	920
10/19/23	Legal research regarding standard for imposition of sanctions and standard of review of sanctions.	1.9	760
	Legal research regarding discussion of the sanctionability of out of court statements and their interplay with first amendment protections.	4.6	1,840
10/20/23	Legal research regarding a trial court's evidentiary decision concerning partial completeness of evidence as error in support of appellate brief; strategize and draft portions of brief sections regarding death penalty sanctions, adverse inferences, and first amendment protections.	5.0	2,000
10/23/23	Strategize and draft additional portions of statement of facts and statement of the case.	4.0	1,600

10/24/23	Revisions and edits to appeal brief; review trial court record and incorporate citations into brief; review and analyze appellate record and incorporate document citations into brief; cross-check legal citations and incorporate additional legal authority into brief.	7.0	2,800
10/25/23	Strategize and outline additional section of appellate brief regarding IIED and the effect of default judgment on same.	5.0	2,000
10/26//23	Research and analyze caselaw where defamation against a defined group is actionable; research and analyze caselaw where successful defamation claims included harassment; research and analyze standards of review regarding challenges to sufficiency of evidence to support damages; incorporate research into section of brief regarding insufficiency of IIED damages evidence.	7.8	3,120
10/27/23	Continue drafting and editing section of appellate brief regarding lack of evidence supporting IIED damages; review and analyze plaintiffs' petition to determine allegations supporting IIED claims; draft outline regarding challenge to default judgment on IIED claim; review procedural history and draft timeline of Lewis IIED case, Heslin defamation case, and Heslin IIED case.	6.5	2,600
10/30/23	Continue review of procedural history and draft timeline of Lewis IIED case, Heslin defamation case, and Heslin IIED case; revise and edit full appellate brief; edit order and headings.	4.1	1,640
10/31/23	Begin drafting legal authority of section of appellate brief regarding improper granting of default judgment as to IIED claims.	4.3	1,720
			<b>\$38,600</b>
<b>Time Keeper</b>	<b>Lynn Hardaway (\$800/hour)</b>		
<b>Date</b>	<b>Description</b>	<b>Time</b>	<b>Total</b>
10/11/23	Drafted memo and legal research; Reviewed TX statutes; Reviewed proceedings and decisions on issue	4.8	3,840
			<b>\$3,840</b>
<b>TOTAL PROF. FEES</b>			<b>48,040</b>
EXPENSES			

	<b>TOTAL EXPENSES</b>		<b>\$48,040</b>
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**Grand Total: \$48,040**  
**Payable on receipt**

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## THE REYNAL LAW FIRM, P.C.

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December 5<sup>th</sup>, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218  
Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones in November 2023.

Time Keeper	F. Andino Reynal (\$800/hour)		
Date	Description	Time	Total
11.04.23	revised appellate brief	3	\$2,400
11.05.23	Reviewed appellate brief	2	\$1,600
11.06.23	Reviewed appellate brief	1	\$800
	Status Report to 5th Cir	0.2	\$160
11.07.23	Edited brief on appeal	8	\$6,400
11.08.23	Edited brief on appeal	10	\$8,000
			<b>\$19,360</b>
Time Keeper	West Medlin (400/hour)		
Date	Description	Time	Total
11/01/23	Review and analyze petitions and amendments thereto related to Lewis' standalone IIED claim; Heslin's defamation suit; and Heslin's IIED suit in furtherance of drafting section of appellate brief regarding improper granting of default judgment as to IIED.	3.2	\$1,280.00

11/02/23	Continue reviewing entire record of all three lawsuits before being consolidated in furtherance of drafting procedural timeline for entire matter.	4.4	\$1,760.00
11/03/23	Continue drafting section of appellate brief regarding improper granting of default as to Heslin and Lewis IIED claims.	5.0	\$2,000.00
11/05/23	Revise and edit appellate brief; review and analyze case record and procedural history; incorporate record citations to brief.	5.9	\$2,360.00
11/06/23	Revise and edit appellate brief; strategy meeting with lead attorney regarding same; review and analyze procedural history in Sandy Hook cases and continue drafting timeline.	5.6	\$2,240.00
11/07/23	Review and incorporate additional citations into appellate brief; review and analyze appellate record in furtherance of same; review and analyze legal authority discussing viability of defamation claims against unnamed individuals that are part of a particularized group.	2.8	\$1,120.00
11/08/23	Draft and edit new IIED section in appellate brief merging portions of prior sections; meeting with lead attorney regarding edits and comments of entire appellate brief; implement edits and comments throughout brief; draft and reorganize section of brief regarding post-trial amendments; telephone conference with cocounsel regarding brief.	7.5	\$3,000.00
11/09/23	Final edits and review of appellate brief.	4.1	\$1,640.00
			<b>\$15,400</b>
<b>TOTAL PROF. FEES</b>			<b>\$34,760</b>
EXPENSES			
<b>TOTAL EXPENSES</b>			<b>\$34,760</b>

**Grand Total: \$34,760**  
**Payable on receipt**